

## Message

**From:** Powell, John [john.powell@hq.doe.gov]  
**Sent:** 2/11/2022 9:50:10 PM  
**To:** Nelson, Karen [nelson.karen@epa.gov]; McKenna, Chris [McKenna.Chris@epa.gov]  
**Subject:** Re: Comments on SRE Denial Proposal

Let's talk next week. I'll look at the Verleger analysis but in the past his analysis has been very client answer focused (see his Keystone XL P/L analysis for the environmental interests. )

I tend to focus on statute but do have thoughts on equal RFS costs and RIN pass through.

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**From:** McKenna, Chris <McKenna.Chris@epa.gov>  
**Sent:** Friday, February 11, 2022 4:42 PM  
**To:** Powell, John; Nelson, Karen  
**Subject:** [EXTERNAL] RE: Comments on SRE Denial Proposal

John,

Thanks very much, certainly appreciate any feedback. Please let me know when you'd like to chat - my schedule is pretty open next week, especially afternoons.

I haven't seen any studies commissioned by non-refiners for this particular issue – NCGA cited a paper by Phil Verleger and RFA cited a paper by some people at Iowa State, but that's all I've seen so far.

Thanks again,  
Chris

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**From:** Powell, John <john.powell@hq.doe.gov>  
**Sent:** Friday, February 11, 2022 3:13 PM  
**To:** McKenna, Chris <McKenna.Chris@epa.gov>; Nelson, Karen <nelson.karen@epa.gov>  
**Subject:** RE: Comments on SRE Denial Proposal

Happy to review. I started with Ex. 4 CBI

We definitely should talk.

Have you found any non-refineries that have provided studies? RFA etc.?

John Powell  
202-586-1814

Ex. 6 Personal Privacy (PP)

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**From:** McKenna, Chris <McKenna.Chris@epa.gov>  
**Sent:** Friday, February 11, 2022 9:25 AM  
**To:** Nelson, Karen <nelson.karen@epa.gov>; Powell, John <john.powell@hq.doe.gov>  
**Subject:** [EXTERNAL] RE: Comments on SRE Denial Proposal

Karen – thanks very much for setting this up, extremely helpful.

John – I’ve been going through the CBI comments, they contain a lot of duplicate info (petitions, DOE scores) that you’ve already seen, and many academic articles (in the small refinery coalition comments) that aren’t very relevant. The comments that I think we could most use your help in addressing are those from the small refineries themselves – in particular, several of the small refineries commissioned/submitted studies specific to their operations. Any thoughts you have on these would be helpful, here’s a list of the refineries that submitted studies, and the companies that did the studies,

RefineryStudy

Ex. 4 CBI

Thanks very much for any thoughts/comments,  
Chris

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**From:** Powell, John <[john.powell@hq.doe.gov](mailto:john.powell@hq.doe.gov)>  
**Sent:** Friday, February 11, 2022 8:33 AM  
**To:** Nelson, Karen <[nelson.karen@epa.gov](mailto:nelson.karen@epa.gov)>  
**Cc:** McKenna, Chris <[McKenna.Chris@epa.gov](mailto:McKenna.Chris@epa.gov)>  
**Subject:** RE: Comments on SRE Denial Proposal

If you have successfully used box.com in the past, let’s try that. Let me know the details when you are ready.

Thanks.

I am getting started with the Docket’s public documents, but it would be good to have all in one place,

John Powell  
202-586-1814

Ex. 6 Personal Privacy (PP)

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**From:** Nelson, Karen <[nelson.karen@epa.gov](mailto:nelson.karen@epa.gov)>  
**Sent:** Friday, February 11, 2022 8:30 AM  
**To:** Powell, John <[john.powell@hq.doe.gov](mailto:john.powell@hq.doe.gov)>  
**Cc:** [McKenna.Chris@epa.gov](mailto:McKenna.Chris@epa.gov)  
**Subject:** [EXTERNAL] Comments on SRE Denial Proposal

Hi John,

Chris and I are looking to find an efficient way to share the comments we received on the proposal with you. A decent number of the public comments are available in the docket, here: <https://www.regulations.gov/docket/EPA-HQ-OAR-2021-0566/comments?pageNumber=2>. We also received several comments under claims of confidentiality, these are not available in the docket. Some of the CBI comments include very large files that we might not be able to send as email attachments. Unless DOE can receive .zip file attachments? Otherwise, we'll need to find another means of transmitting these very large documents. I have a few ideas for sharing those that I know have worked in the past with other agencies.

When we share records with the Dept. of Justice, we frequently use box.com. It's a shared online drive that we can upload all the comments into at once, and they will be almost instantly accessible to you. Since we use this to share CBI with DOJ, I'm sure we can also share the CBI comments with DOE using this method.

Alternatively, we have recently used a similar service called GoAnywhere to share documents with GAO for the SRE audit they're conducting. Same about using GoAnywhere to transfer CBI.

Does DOE use something similar that we could ask our team about using?

Or Chris, did you have a few other ideas that I missed?

Thanks!

-Karen

Thank you for your time.

Sincerely,  
Karen Nelson  
(Pronouns: she/her)  
Compliance Division  
(734) 214-4657

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